

UNITED STATES DISTRICT COURT
OF THE
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ OCT 21 2016 ★

UNITED STATES OF AMERICA,

Plaintiff

v.

IRINA SHELIKHOVA, et al.,

Defendants

BROOKLYN OFFICE

Regarding Order:

10-cr-771 (NG)

Objection to Eviction sought by the Government

Now comes the defendant, Irina Shelikhova pro se, a prisoner in federal custody, in response to the government's application for a Writ of Assistance and Order of Eviction, pertaining to the property located at 8686 Bay Parkway, Apt 2-C, Brooklyn, New York (the property).

The defendant herewith states that the property is occupied by her disabled, lethargic, torporific, elderly mother, who is unable to be relocated at this time.

The defendant is unable to care for or make any arrangements for the care of her bedridden mother, suffering from, among many physical ailments, dementia, for whom she has assumed sole care-giving responsibility.

The defendant had previously pleaded to make arrangements with the government for a temporary financial arrangement, meaning that the government would accept a rental amount until another arrangement or resolution can be found. However the respondent has not heard anything in response to her plea, other than the response before this honorable court where her attorney agreed to forfeiture before her Honor despite and inspite of what he was directed to do by defendant.

The defendant asks that the government would set a marketable sales price for the property, based on comparable area sales and a current assessment or appraisal, and be agreeable to sell the property to a potential investor, who in turn would be agreeable to rent the property for the use of defendant's mother until another resolution can be found.

Defendant prays to this honorable court to grant relief as it may deem proper

and appropriate; defendant further prays for the compassion of the court to let an old and sick woman remain in familiar, customized (ADA) surroundings, as a move at this time and in her condition may very well be life threatening.

Respectfully submitted,

this 18 day of October 2016



Irina Shelikhova, pro se
Federal Reg. No. 81448-053
FCI Tallahassee
501 Capital Circle NE
Tallahassee, FL 32301

CERTIFICATE OF SERVICE

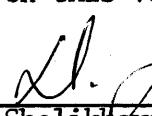
This is to certify that I have served a true and correct copy of the foregoing to:

USDOJ/USAO
Attn: Yvette Ramos
271 Cadman Plaza East
Brooklyn, New York 11201-1820

and

The United States District Court
of the Eastern District of New York
Clerk of Court
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East, Room 118S
Brooklyn, New York 11201-1818

Having placed the same in a sealed envelope, bearing sufficient postage for delivery via the United States Postal Service and delivered it by hand to the mailroom located on the grounds of the FCI Tallahassee, Florida on this very same day of October 2016.



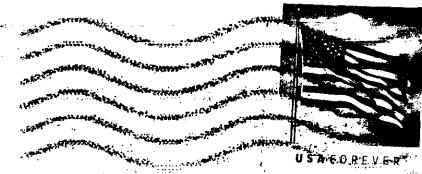
Irina Shelikhova, pro se
Fed. Reg. No. 81448-053
FCI Tallahassee, FL

Litigation is deemed FILED at the time it is delivered to prison authorities. See Houston v. Lack, 487 US 266, 101 L.Ed 2d 245, 108 S.Ct. 2379 (1988)

SHELIKHOVA IRINA
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Federal Correctional
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Tallahassee, FL 32301

TALLAHASSEE, FL 32301

17 OCT 2016 PM 12:17



♦81448-053♦

Clerk Of U S District Court
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T. R. U.S.Cthse - Rm 118S
Brooklyn Heights, NY 11201-1818
United States

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